

EXHIBIT 5

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

TENNESSEE STATE CONFERENCE OF
THE N.A.A.C.P., *et al.*,

Plaintiffs,

v.

TRE HARGETT, in his official capacity as
Secretary of State of the State of Tennessee, *et al.*,

Defendants.

Civil Nos. 3:19-cv-365; 3:19-cv-385
Judge Aleta A. Trauger

LEAGUE OF WOMEN VOTERS OF
TENNESSEE, *et al.*,

Plaintiffs,

v.

TRE HARGETT, *et al.*,

Defendants.

DECLARATION OF DANIELLE M. LANG

Pursuant to 28 U.S.C. § 1746, I, Danielle M. Lang, hereby declare as follows:

1. I am the Co-Director of the Voting Rights and Redistricting program at the Campaign Legal Center (“CLC”). I am admitted pro hac vice in this matter. I have personal knowledge of the facts set forth herein.

2. CLC is a non-profit, non-partisan organization under section 501(c)(3) of the Internal Revenue Code. CLC was established in 2002 in Washington D.C., and works to advance democracy through law, including by vindicating the voting rights of all eligible Americans.

3. CLC has litigated numerous voting rights cases, including but not limited to *Veasey v. Abbott*, 137 S.Ct. 612 (2017); *Gill v. Whitford*, 138 S.Ct. 1916 (2018); *Rucho v. Common Cause*, 139 S.Ct. 2484 (2019); *Mays v. LaRose*, 951 F.3d 775 (6th Cir. 2020); *Jones v. Governor of Florida*, 975 F.3d 1016 (2020); *Texas LULAC v. Whitley*, 2019 WL 793511 (W.D. Tex. Feb. 27, 2019); *Spirit Lake Tribe v. Jaeger*, 2020 WL 625279 (D.N.D. Feb. 10, 2020); *Texas LULAC v. Abbott*, --F.Supp. 3d --, 2020 WL 599969 (W.D. Tex. Oct. 9, 2020); and *Thompson v. Merrill*, 2020 WL 7080308 (M.D. Ala. Dec. 3, 2020).

4. CLC has represented plaintiffs seeking to vindicate their fundamental right to vote in state and federal jurisdictions across the country. Except in rare circumstances, we do not bill our clients for our legal services and did not do so in this case.

5. Together with the national American Civil Liberties Union (“ACLU”), ACLU of Tennessee (“ACLU-TN”), Fair Elections Center (“FEC”), and Sherrard, Roe, Voigt & Harbison, PLC, CLC was retained to represent the League of Women Voters of Tennessee, League of Women Voters of Tennessee Education Fund, American Muslim Advisory Council, Mid-South Peace & Justice Center, Rock the Vote, Memphis Central Labor Council, and HeadCount.

6. CLC’s work in this matter began in the spring of 2019. I am fully familiar with all aspects of this matter, and the work of CLC attorneys on the same. I was the lead attorney for CLC in this matter. I oversaw the work of my CLC colleagues Molly Danahy, Urja Mittal, and Jeff Zalesin, who served as counsel in this matter. I am familiar with their qualifications.

7. In support of this declaration, CLC submits contemporaneous billing records for the attorney time devoted to this matter. These billing records are attached as Exhibit A. Exhibit A is true, accurate, and based on contemporaneous records of the activities in the case maintained as business records in my office. The records include information by attorney name, date of work, time billed, and a narrative description of the work completed.

8. I have reviewed the time entries for the time that I have expended in this case. I have also reviewed and approved the time entries for the other Campaign Legal Center attorneys that worked on this matter with me. The hours expended were necessary in rendering legal services to the Plaintiffs in this case.

9. In compiling our attorneys' fees, we used reduced rates from the market rate in our region, excluded numerous staff members and timekeepers that worked on this matter, and include only a portion of the work actually performed.

10. In an exercise of billing judgment, all counsel for the League of Women Voters-Plaintiffs are using the hourly rate scale used by our Nashville-based co-counsel, Sherrard Roe Voigt & Harbison, PLC ("SVRH"), in order to ensure the fees sought reflect "the prevailing market rates in the relevant community." *Blum v. Stenson*, 465 U.S. 886, 895 (1984). The hourly rates for CLC staff are reflected in the chart below:

<i>Name (position)</i>	<i>Hourly Rate</i>
Danielle M. Lang (attorney)	\$400
Molly E. Danahy (attorney)	\$335
Urja Mittal (attorney)	\$310
Jeff Zalesin (attorney)	\$270

11. I graduated from Yale Law School in 2012. From 2012 to 2013, I clerked for the Honorable Richard A. Paez of the U.S. Court of Appeals for the Ninth Circuit. From 2013 to 2015, I served as a Skadden Fellow in the Employment Rights Project of Bet Tzedek Legal Services in

Los Angeles, where I represented low-wage immigrant workers in wage and hour, discrimination and human trafficking matters. As a labor attorney, I handled complex class-action and federal court litigation. I joined Campaign Legal Center in 2015 and have since managed numerous voting rights cases in district court, appellate court, and the U.S. Supreme Court. After five years at Campaign Legal Center, I manage a team of attorneys and serve as the co-director of the voting rights and redistricting program. I also teach, as an adjunct professor, an Election Law Practicum with Mr. Gerry Hebert at Georgetown University Law Center. This year, I also taught in the Rule of Law Clinic at Yale Law School. I am a member of the District of Columbia, New York and California bars, as well as the bars of the U.S. Supreme Court, the U.S. Courts of Appeals for the Fifth Circuit, Sixth Circuit, Ninth Circuit, and Eleventh Circuit and the U.S. District Courts for the District of Columbia and Central District of California

12. My colleague Molly Danahy graduated from Georgetown University Law Center in 2016. From 2016 to 2017, Ms. Danahy held a voting rights fellowship at CLC. From 2017 to 2018, Ms. Danahy clerked for the Honorable B. Lynn Winmill of the United States District Court for the District of Idaho. In 2018, Ms. Danahy rejoined CLC as a member of the litigation team and has since served as counsel in numerous voting rights and campaign finance cases. Ms. Danahy is a member of the New York and District of Columbia bars, as well as the bars of the U.S. Courts of Appeals for the Fifth, Sixth, Eleventh, and D.C. Circuits, and the U.S. District Courts for the District of Columbia and the District of Maryland.

13. Urja Mittal graduated from Yale Law School in 2017. From 2017 to 2018, Ms. Mittal clerked for the Honorable Vince Chhabria of the United States District Court for the Northern District of California. From 2018 to 2019, Ms. Mittal served as legal fellow at Campaign Legal Center, where she worked on voting rights and campaign finance reform litigation. As a law

student, Ms. Mittal served as Executive Editor of the Yale Law Journal, and as a constitutional litigation teaching assistant to Judges Guido Calabresi and John Walker. Ms. Mittal also worked as a summer associate at Jenner and Block during the summer of 2016, and as a legal intern at the Criminal Division of the U.S. Attorney's Office for the Southern District of New York and later the Office of Chair Ann Ravel of the Federal Election Commission during the summer of 2015. After her fellowship with Campaign Legal Center, Ms. Mittal clerked on the Supreme Court of California. Ms. Mittal is admitted to the California and the DC Bars, and the bar of the United States District Court for the Northern District of California.

14. Jeff Zalesin graduated from Yale Law School in 2019. From 2019 to 2020, Mr. Zalesin served as a Yale Law Journal Public Interest fellow at Campaign Legal Center, where he worked on voting rights and census-related litigation. In law school, Mr. Zalesin was a member of Yale's Rule of Law clinic, working on litigation related to the 2020 Census and advocacy for expanded voting rights in Connecticut. Mr. Zalesin also worked as a summer associate at Arnold & Porter Kaye Scholer, LLP during the summer of 2018, and as a legal intern at the Campaign Legal Center during the summer of 2017. Mr. Zalesin now serves as a clerk to the Honorable Christopher R. Cooper on the U.S. District Court for the District of Columbia. Mr. Zalesin is a member of the D.C. Bar.

15. All Campaign Legal Center staff have exercised reasonable billing judgment in this case. CLC excluded from its fee request *de minimis* hours spent by attorneys in this matter including senior leadership members Paul Smith and Adav Noti, as well as approximately 24 hours of paralegal and support staff time. In addition, CLC has excluded from its request hours spent on legal team calls and meet and confers which included another CLC attorney who has documented

that time, pre-filing time spent in communication with clients, and hours spent preparing the fee petition in this matter.

16. In total, CLC attorneys and staff devoted over 316.6 hours to this case; however CLC seeks compensation for only 252.9 hours. In sum, CLC seeks a reasonable fee award of \$83,132.10, as outlined in the chart below:

<i>Name (position)</i>	<i>Time Spent</i>	<i>Hourly Rate</i>	<i>Billable Amount</i>
Danielle M. Lang (attorney)	45.6	\$400	\$18,240.00
Molly E. Danahy (attorney)	66.3	\$335	\$22,210.50
Urja Mittal (attorney)	115.6	\$310	\$35,823.60
Jeff Zalesin (attorney)	25.4	\$270	\$6,858.00
Total	252.9		\$83,588.10

17. These expenses were reasonably incurred by CLC in the course of providing representation to the Plaintiffs, and Plaintiffs' counsel made appropriate efforts during the litigation to reduce unnecessary expenses. CLC has not billed for many of its expenses in litigating this case including Westlaw and LexisNexis costs, phone bills, copying, and other internal office expenses.

18. The hourly rates, hours, and expenses reflected in this declaration and its attachments are customary and reasonable and were necessarily incurred in representing Plaintiffs in this matter.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on December 21, 2020 in Washington, D.C.

/s/ Danielle M. Lang

Danielle M. Lang
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EXHIBIT A

Name	Total Hours	Hours Claimed	Hours Excluded	Year	Rate	Amount Claimed
Adav Noti	0.3	0	0.3	2003	0	\$ -
Danielle Lang	48.3	45.6	2.7	2012	400	\$ 18,240.00
Jeffrey Zalesin	26.7	25.4	1.3	2019	270	\$ 6,858.00
Jonathan Diaz	1.3	0	1.3	2016	0	\$ -
Lernik Begian	16.3	0	16.3	Para	0	\$ -
Molly Danahy	71.7	66.3	5.4	2016	335	\$ 22,210.50
Moshe Pasternak	7.8	0	7.8	Para	0	\$ -
Paul Smith	0.5	0	0.5	1979	0	\$ -
Urja Mittal	143.7	115.6	28.2	2017	310	\$ 35,823.60
Total	316.6	252.9	63.8	-	-	\$ 83,132.10

316.6

Claimed CLC Hours

	A	B	C	D
1	Attorney	Date	Duration	Memo
2	Danielle Lang	4/30/2019	0.2	Mtg with U. Mittal and M. Danahy re: complaint drafting
3	Danielle Lang	4/30/2019	0.1	Call with LCCRUL
4	Danielle Lang	5/1/2019	0.4	Meeting with U. Mittal
5	Danielle Lang	5/3/2019	0.3	Call with S. Lakin reco-counseling agreement
6	Danielle Lang	5/4/2019	0.2	Reviewing co-counseling agreement
7	Danielle Lang	5/4/2019	0.3	Call with S. Lakin re complaint filing
8	Danielle Lang	5/6/2019	1.2	Call with co-counsel re: draft complaint and NVRA letter
9	Danielle Lang	5/6/2019	2.2	Reviewing case law, statutory text, and fact development memo for draft complaint and NVRA letter
10	Danielle Lang	5/6/2019	0.2	Reviewing and signing co-counseling agreement
11	Danielle Lang	5/6/2019	0.6	Meeting with CLC team re: next tasks for complaint filing
12	Danielle Lang	5/6/2019	0.2	Emails to co-counsel re: research for complaint/NVRA letter
13	Danielle Lang	5/7/2019	0.3	Emails with co-counsel re complaint drafting
14	Danielle Lang	5/7/2019	1.4	Edits to draft NVRA letter
15	Danielle Lang	5/7/2019	3.8	Edits to complaint
16	Danielle Lang	5/29/2019	1.4	Litigation team call
17	Danielle Lang	6/3/2019	0.6	Reviewing and editing amended complaint
18	Danielle Lang	6/10/2019	0.6	Call with litigation team re: amended complaint
19	Danielle Lang	6/10/2019	0.2	Meeting with U. Mittal
20	Danielle Lang	6/11/2019	0.2	Reviewing new retainer for MCLC
21	Danielle Lang	6/12/2019	0.4	Reviewing additional allegations for amended complaint
22	Danielle Lang	6/13/2019	0.1	Outreach to client Spread the Vote
23	Danielle Lang	6/17/2019	0.1	Reviewing membership standing memo
24	Danielle Lang	6/18/2019	0.5	Call with litigation team
25	Danielle Lang	6/18/2019	0.5	Call with spread the vote
26	Danielle Lang	6/19/2019	0.1	Review of representation termination letter
27	Danielle Lang	6/19/2019	0.2	Call with client
28	Danielle Lang	6/19/2019	4.2	Edits to amended complaint
29	Danielle Lang	6/20/2019	0.7	Call re edits to amended complaint
30	Danielle Lang	6/20/2019	0.7	Reviewing edits to the amended complaint
31	Danielle Lang	7/16/2019	1.4	Edits to PI draft
32	Danielle Lang	7/16/2019	2	Reading and reviewing motion to dismiss in both cases & reviewing other documents in the case to prepare for motion to dismiss review
33	Danielle Lang	7/17/2019	1.7	Edits to PI draft
34	Danielle Lang	7/26/2019	1	Call re PI
35	Danielle Lang	8/19/2019	4.2	Edits to PI draft
36	Danielle Lang	8/27/2019	3	Edits to PI draft
37	Danielle Lang	9/9/2019	1	Reviewing MTD opinion
38	Danielle Lang	9/12/2019	0.7	Reading PI opinion
39	Danielle Lang	9/12/2019	0.5	Drafting reply brief
40	Danielle Lang	10/22/2019	0.4	Call with co-counsel re: case management
41	Danielle Lang	10/29/2019	0.4	Follow up call with legal team re meet and confer
42	Danielle Lang	10/29/2019	0.6	Meet and confer with opposing counsel
43	Danielle Lang	10/30/2019	0.2	Edits to case management report

Claimed CLC Hours

	A	B	C	D
1	Attorney	Date	Duration	Memo
44	Danielle Lang	11/7/2019	0.1	Review of client communication
45	Danielle Lang	11/14/2019	0.3	Reviewing initial disclosures
46	Danielle Lang	11/15/2019	0.3	Meeting re initial disclosures
47	Danielle Lang	11/19/2019	0.3	Meeting with M. Danahy re: initial disclosures
48	Danielle Lang	11/25/2019	1.2	Drafting Rule 45 subpoenas to counties
49	Danielle Lang	11/27/2019	0.6	Edits to proposed discovery requests
50	Danielle Lang	11/27/2019	0.8	Revisions to second amended complaint
51	Danielle Lang	12/10/2019	0.3	Reviewing draft discovery
52	Danielle Lang	1/16/2020	0.3	Reviewing and assigning research re motion to quash
53	Danielle Lang	2/20/2020	0.3	Meeting re: bills proposing to repeal challenged legislation
54	Danielle Lang	2/21/2020	1.3	Reviewing proposed legislation and call with co-counsel (.2)
55	Danielle Lang	3/23/2020	0.3	Call re impact of pending legislation
56	Danielle Lang	3/27/2020	0.2	Correspondence re: bill to repeal restrictions
57	Danielle Lang	4/17/2020	0.3	Team call re: next steps in litigation
58	Jeffery Zalesin	11/13/2019	0.7	Call with legal team
59	Jeffery Zalesin	11/13/2019	0.3	Prep for call with legal team
60	Jeffery Zalesin	11/21/2019	4.5	Draft subpoenas for county election administrators
61	Jeffery Zalesin	11/22/2019	0.2	Draft subpoena to county election official
62	Jeffery Zalesin	11/25/2019	0.2	Reviewing subpoena
63	Jeffery Zalesin	11/27/2019	0.9	Review draft discovery requests
64	Jeffery Zalesin	12/10/2019	0.4	Call with legal team re discovery matters
65	Jeffery Zalesin	12/11/2019	1.4	Reviewing drafts of discovery requests
66	Jeffery Zalesin	12/12/2019	0.5	Reviewing drafts of discovery requests
67	Jeffery Zalesin	1/3/2020	0.6	Call with legal team re: discovery
68	Jeffery Zalesin	1/16/2020	0.6	Call with legal team re: discovery
69	Jeffery Zalesin	1/17/2020	0.8	Meet-and-confer call re: motions to quash in W.D. Tenn.
70	Jeffery Zalesin	1/22/2020	1.7	Research for opposition to Shelby County motion to quash
71	Jeffery Zalesin	1/23/2020	5.2	Research for opposition to Shelby County motion to quash
72	Jeffery Zalesin	1/28/2020	6.3	Drafting response to Shelby County motion to quash
73	Jeffery Zalesin	2/12/2020	0.2	Review draft proposal to Shelby County for doc production pursuant to subpoena
74	Jeffery Zalesin	2/12/2020	0.5	Call with legal team re: discovery
75	Jeffery Zalesin	2/18/2020	0.1	Review draft discovery motion
76	Jeffery Zalesin	3/27/2020	0.3	Call with co-counsel re pending legislation
77	Molly Danahy	4/30/2019	0.6	Legal research final TN bill language
78	Molly Danahy	5/6/2019	1.3	Prep for call with co-counsel, post-call notes and follow-up
79	Molly Danahy	5/6/2019	0.4	DDC admission - pre-requisite for pro hac
80	Molly Danahy	5/7/2019	0.7	Review/revise NVRA letter
81	Molly Danahy	5/7/2019	1.4	Revising complaint
82	Molly Danahy	5/7/2019	0.5	Discussion with U. Mittal re claims
83	Molly Danahy	5/7/2019	1.5	Review draft complaint
84	Molly Danahy	5/7/2019	1.1	Review draft NVRA letter
85	Molly Danahy	5/7/2019	1.1	Review draft NVRA letter

Claimed CLC Hours

	A	B	C	D
1	Attorney	Date	Duration	Memo
86	Molly Danahy	5/8/2019	0.3	Final review of NVRA letter
87	Molly Danahy	5/8/2019	0.2	Review NVRA letter
88	Molly Danahy	5/8/2019	1.5	Review draft complaint
89	Molly Danahy	5/8/2019	0.2	Final review complaint
90	Molly Danahy	5/8/2019	0.2	Editing notice letter
91	Molly Danahy	5/8/2019	0.6	Call with co-counsel
92	Molly Danahy	5/8/2019	0.2	Reviewing revised complaint
93	Molly Danahy	5/8/2019	0.4	Review NVRA draft
94	Molly Danahy	5/8/2019	0.9	Finalizing complaint
95	Molly Danahy	5/9/2019	0.7	Preparing complaint for filing
96	Molly Danahy	5/13/2019	0.7	Review retainer agreement
97	Molly Danahy	5/14/2019	0.1	Review retainer agreement
98	Molly Danahy	5/15/2019	1.2	Call with CLC team and co-counsel
99	Molly Danahy	5/15/2019	0.2	Call with U. Mittal
100	Molly Danahy	5/16/2019	0.2	Reviewing TN NAACP NVRA letter
101	Molly Danahy	5/16/2019	0.5	Communication with legal team
102	Molly Danahy	5/28/2019	0.2	Reviewing case deadlines, case management conference
103	Molly Danahy	5/29/2019	0.6	Meeting with U. Mittal to prep call with legal team
104	Molly Danahy	5/29/2019	0.7	Meeting with U. Mittal to prep fact development calls
105	Molly Danahy	6/4/2019	0.8	Reviewing defendants' MTD in related TN NAACP case
106	Molly Danahy	6/18/2019	0.7	Call with legal team
107	Molly Danahy	6/20/2019	0.4	Review amended complaint
108	Molly Danahy	6/21/2019	0.9	Review amended complaint
109	Molly Danahy	6/21/2019	1.7	Review amended complaint
110	Molly Danahy	6/21/2019	0.7	Review response to MTD in related case
111	Molly Danahy	6/28/2019	1	Call with legal team to discuss scheduling conf
112	Molly Danahy	7/1/2019	0.6	Discuss scheduling conference with U. Mittal
113	Molly Danahy	7/1/2019	0.3	Review proposed scheduling order
114	Molly Danahy	7/2/2019	0.1	Meet and confer with state re CMO
115	Molly Danahy	7/15/2019	3.3	Edit MTD opposition brief
116	Molly Danahy	7/15/2019	0.9	Review MTD opposition brief
117	Molly Danahy	7/16/2019	0.4	Edit opposition to MTD
118	Molly Danahy	7/17/2019	0.5	Review opposition to MTD
119	Molly Danahy	7/18/2019	0.2	Final review MTD opposition brief
120	Molly Danahy	8/1/2019	0.1	Pro Hac Motion
121	Molly Danahy	8/3/2019	0.8	Review PI outline
122	Molly Danahy	8/13/2019	3.7	Review PI draft
123	Molly Danahy	8/15/2019	0.2	Email to plaintiffs re: declarations
124	Molly Danahy	8/16/2019	0.7	Draft RTV declaration
125	Molly Danahy	8/17/2019	0.6	Draft MCLC declaration
126	Molly Danahy	8/19/2019	0.5	Call with RTV
127	Molly Danahy	8/19/2019	0.3	Meet with D. Lang
128	Molly Danahy	8/21/2019	0.2	Review and update RTV declaration
129	Molly Danahy	8/23/2019	0.4	Review draft PI
130	Molly Danahy	8/23/2019	0.2	Review and update MCLC declaration
131	Molly Danahy	8/26/2019	0.4	Review and update MCLC and RTV declarations

Claimed CLC Hours

	A	B	C	D
1	Attorney	Date	Duration	Memo
132	Molly Danahy	8/26/2019	0.5	Review and update RTV declaration
133	Molly Danahy	8/26/2019	1.4	Review and update MCLC declaration
134	Molly Danahy	8/27/2019	0.3	Revise client declarations
135	Molly Danahy	8/28/2019	0.4	Revise client declarations
136	Molly Danahy	8/28/2019	1.1	Revise client declarations
137	Molly Danahy	8/29/2019	0.6	Revise MCLC declaration
138	Molly Danahy	9/3/2019	0.4	Review PI opp in related case
139	Molly Danahy	9/9/2019	0.6	Review order on MTD
140	Molly Danahy	9/10/2019	0.2	Meet with D. Lang
141	Molly Danahy	9/10/2019	0.2	Email clients re MTD opinion
142	Molly Danahy	9/10/2019	0.2	Review PI response
143	Molly Danahy	9/11/2019	2.4	Edit draft PI reply
144	Molly Danahy	9/11/2019	0.3	Email to RTV
145	Molly Danahy	9/12/2019	0.7	Reviewing PI decision
146	Molly Danahy	9/12/2019	0.4	Review PI opinion
147	Molly Danahy	9/19/2019	0.6	Review appeal and case management deadlines
148	Molly Danahy	9/25/2019	0.2	Reading outside analysis of the case
149	Molly Danahy	9/30/2019	0.3	Reviewing deadlines
150	Molly Danahy	10/9/2019	0.4	Review TN Answer
151	Molly Danahy	10/16/2019	0.4	Review appellate deadlines
152	Molly Danahy	10/17/2019	0.8	Reviewing case management meet and confer procedures
153	Molly Danahy	10/21/2019	0.4	Reviewing CM proposals
154	Molly Danahy	10/22/2019	0.2	review CM proposals with D. Lang
155	Molly Danahy	10/28/2019	0.1	meet and confer scheduling
156	Molly Danahy	10/29/2019	0.3	Update on meet and confer
157	Molly Danahy	10/30/2019	0.2	Emails re: scheduling conference
158	Molly Danahy	10/30/2019	0.2	Discuss state CMO proposal
159	Molly Danahy	11/7/2019	1	Draft email to TN clients re: initial disclosures
160	Molly Danahy	11/8/2019	0.2	Scheduling client calls
161	Molly Danahy	11/11/2019	0.2	Confirming call with RTV
162	Molly Danahy	11/12/2019	0.3	Call with RTV re: initial disclosures
163	Molly Danahy	11/12/2019	0.1	Prep for client calls
164	Molly Danahy	11/14/2019	0.2	Call with MCLC re: initial disclosures
165	Molly Danahy	11/14/2019	0.1	Scheduling call with MCLC re: initial disclosures
166	Molly Danahy	11/14/2019	0.4	Review/edit initial disclosures
167	Molly Danahy	11/14/2019	0.2	Meet with D. Lang re: initial disclosures
168	Molly Danahy	11/15/2019	0.3	Call with legal team re: discovery matters
169	Molly Danahy	11/18/2019	0.1	Review state's initial disclosures
170	Molly Danahy	11/18/2019	0.2	final review initial disclosures
171	Molly Danahy	11/19/2019	0.3	Discuss state's initial disclosures with D. Lang
172	Molly Danahy	11/21/2019	0.4	Review amended complaint
173	Molly Danahy	11/22/2019	0.5	Review draft discovery requests
174	Molly Danahy	11/25/2019	0.2	Review county production request
175	Molly Danahy	11/25/2019	0.2	Plan for reviewing discovery requests
176	Molly Danahy	11/25/2019	0.1	Review subpoena
177	Molly Danahy	11/27/2019	0.5	Review draft discovery requests

Claimed CLC Hours

	A	B	C	D
1	Attorney	Date	Duration	Memo
178	Molly Danahy	11/27/2019	0.4	Reviewing and editing second Am Compl
179	Molly Danahy	12/2/2019	0.1	Review final amendments to compl. and discovery requests
180	Molly Danahy	12/3/2019	0.5	Review and finalize county RFPs
181	Molly Danahy	12/4/2019	0.2	Review motion to amend, finalize county RFPs
182	Molly Danahy	12/5/2019	0.1	Review notices in related case
183	Molly Danahy	12/10/2019	0.2	Review discovery requests
184	Molly Danahy	12/12/2019	0.8	Review discovery requests
185	Molly Danahy	12/13/2019	0.3	Finalize discovery requests
186	Molly Danahy	12/20/2019	0.2	Review TN Answer
187	Molly Danahy	1/3/2020	0.4	Review answer grid
188	Molly Danahy	1/3/2020	0.2	Reviewing county discovery plan
189	Molly Danahy	2/3/2020	0.2	Review draft protective order, county subpoenas
190	Molly Danahy	2/20/2020	0.4	review proposed legislation
191	Molly Danahy	2/25/2020	0.3	Call with MCLC re: new bill
192	Molly Danahy	3/6/2020	0.1	Emails re pending legislation
193	Molly Danahy	3/19/2020	0.4	Review status of TN bills
194	Molly Danahy	3/26/2020	0.3	call with RTV re: pending legislation
195	Molly Danahy	3/26/2020	0.3	call with MCLC re: pending legislation
196	Molly Danahy	3/27/2020	0.8	review press release/client press statements
197	Molly Danahy	4/2/2020	0.8	Communications with clients re: bill passage
198	Molly Danahy	4/2/2020	0.3	Review 6th Cir. op. re fees
199	Molly Danahy	4/10/2020	0.1	Email to T. Lee re next steps
200	Molly Danahy	4/13/2020	0.2	scheduling with counsel team
201	Molly Danahy	4/16/2020	0.1	scheduling with counsel team
202	Molly Danahy	4/17/2020	0.3	Call with legal team re: next steps in litigation
203	Molly Danahy	4/21/2020	0.2	Call with co-counsel re: next steps
204	Urja Mittal	4/22/2019	0.2	Meet with M. Danahy re: legal research tasks
205	Urja Mittal	4/25/2019	3	Legal research for complaint
206	Urja Mittal	4/26/2019	4.8	Legal research for complaint
207	Urja Mittal	4/28/2019	3.3	Legal research and drafting complaint
208	Urja Mittal	4/29/2019	0.5	Meet with D. Lang re: drafting complaint and client outreach
209	Urja Mittal	4/29/2019	7.9	Legal research for complaint
210	Urja Mittal	4/30/2019	1.5	Legal research for complaint
211	Urja Mittal	5/2/2019	1.3	Legal research for complaint
212	Urja Mittal	5/3/2019	2.5	Legal research and drafting complaint
213	Urja Mittal	5/5/2019	0.7	Emails with D.Lang on research and client development; notes on client outreach
214	Urja Mittal	5/6/2019	0.8	Review final bill, emails from co-counsel
215	Urja Mittal	5/6/2019	1.5	Pro hac and certificate of good standing
216	Urja Mittal	5/6/2019	0.2	Emails and legal research
217	Urja Mittal	5/6/2019	0.5	Meeting with D. Lang and M. Danahy re complaint
218	Urja Mittal	5/6/2019	0.3	Legal research on aggregate burden case law for complaint
219	Urja Mittal	5/6/2019	3.4	Drafting memo re petition circulation and voter reg cases for co-counsel

Claimed CLC Hours

	A	B	C	D
1	Attorney	Date	Duration	Memo
220	Urja Mittal	5/6/2019	0.2	Emails about case with L. Begian
221	Urja Mittal	5/6/2019	0.3	Meet with D. Lang re: client follow-up
222	Urja Mittal	5/6/2019	0.5	Present litigation to CLC supervisors and team
223	Urja Mittal	5/7/2019	3.3	Emails with client, draft sections of complaint, emails with co-counsel on standing section.
224	Urja Mittal	5/7/2019	2.8	Emails with Rock the Vote re: complaint; drafting government interest section of complaint; emails re: complaint organization; email to Memphis Central Labor Council
225	Urja Mittal	5/7/2019	0.5	Call with Rock the Vote re: complaint
226	Urja Mittal	5/7/2019	0.7	Draft questions for Rock the Vote re: complaint
227	Urja Mittal	5/7/2019	0.2	Review emails from co-counsel re complaint and notice letter
228	Urja Mittal	5/7/2019	0.5	Call with Spread the Vote with D. Lang
229	Urja Mittal	5/7/2019	1.6	Reviewing draft complaint
230	Urja Mittal	5/7/2019	0.9	Reviewing draft NVRA notice letter
231	Urja Mittal	5/8/2019	1.3	Editing client sections of complaint; emails with clients about Business Entity Disclosure forms; meet with A. Noti re complaint
232	Urja Mittal	5/8/2019	1.5	Emails with Spread the Vote re complaint; emails re pro hac paperwork; emails with co-counsel; reviewing complaint
233	Urja Mittal	5/8/2019	0.5	Reviewing NVRA notice letter
234	Urja Mittal	5/8/2019	1.6	Emails with Rock the Vote about retainer
235	Urja Mittal	5/8/2019	0.4	Editing client sections of complaint
236	Urja Mittal	5/8/2019	0.2	Editing client sections of complaint
237	Urja Mittal	5/8/2019	1.2	Reviewing emails with co-counsel re complaint; reviewing draft complaint; editing client section
238	Urja Mittal	5/9/2019	2	Emails with co-counsel and plaintiffs re complaint filing
239	Urja Mittal	5/9/2019	0.3	Call with P. Garner of Mid-South Peace and Justice Center
240	Urja Mittal	5/9/2019	0.1	Emailing client updates
241	Urja Mittal	5/15/2019	0.2	Call with M. Danahy
242	Urja Mittal	5/15/2019	0.2	Reviewing draft collective retainer agreement
243	Urja Mittal	5/15/2019	0.1	Emails with CLC team re TN NAACP NVRA letter
244	Urja Mittal	5/17/2019	0.3	Emails about retainer, CLC's pro hac paperwork
245	Urja Mittal	5/20/2019	0.2	Fact gathering re: voter reg activity at Natl Civil Rights Museum
246	Urja Mittal	5/21/2019	0.2	Preparing questions for Memphis Central Labor Council
247	Urja Mittal	5/22/2019	0.6	Emailing S. Lakin re: Memphis Central Labor Council
248	Urja Mittal	5/22/2019	1.5	Emailing D. Lang and M. Danahy re: Memphis Central Labor Council
249	Urja Mittal	5/22/2019	0.8	Call with Memphis Central Labor Council
250	Urja Mittal	5/22/2019	0.7	Prep for call with Memphis Central Labor Council
251	Urja Mittal	5/23/2019	0.2	Draft questions for clients for amended complaint
252	Urja Mittal	5/23/2019	0.1	Emailing S.Lakin, D.Lang, M. Danahy re:CivicTN
253	Urja Mittal	5/24/2019	1	Preparing reimbursement request CGS and Pro Hac Fees

Claimed CLC Hours

	A	B	C	D
1	Attorney	Date	Duration	Memo
254	Urja Mittal	5/24/2019	0.2	Emailing D.Lang and M. Danahy re: next steps
255	Urja Mittal	5/24/2019	0.6	Emails to Spread the Vote and Rock the Vote re: amended complaint, joint retainer
256	Urja Mittal	5/24/2019	1.6	Drafting client section of amended complaint
257	Urja Mittal	5/24/2019	0.8	Drafting client section of amended complaint
258	Urja Mittal	5/28/2019	0.3	Emailing S. Lakin re: CivicTN; follow-up email to CivicTN
259	Urja Mittal	5/28/2019	0.3	Email to S. Lakin re case status; email to L. Begian re: pro hac paperwork
260	Urja Mittal	5/28/2019	0.3	Meet with D. Lang re case status
261	Urja Mittal	5/29/2019	0.2	Revising pro hac paperwork and sending to Tom
262	Urja Mittal	5/29/2019	0.3	Email to Memphis Central Labor Council
263	Urja Mittal	5/29/2019	0.7	Prep for call with legal team with M. Danahy
264	Urja Mittal	5/29/2019	0.3	Fact development call
265	Urja Mittal	5/29/2019	0.5	Prep for fact development call with M. Danahy
266	Urja Mittal	5/30/2019	0.3	Emails with Rock the Vote and Spread the Vote, follow-up meeting with M. Danahy
267	Urja Mittal	5/30/2019	0.2	Updating ECF account
268	Urja Mittal	5/31/2019	4.0	Editing amended complaint and circulating revisions
269	Urja Mittal	6/3/2019	0.3	Email to D. Lang re preliminary relief
270	Urja Mittal	6/4/2019	0.3	Meeting with L. Begian about tracking related TN NAACP case
271	Urja Mittal	6/7/2019	0.1	Emails re MTD filing
272	Urja Mittal	6/10/2019	0.9	Client emails re: motion to dismiss and amended complaint
273	Urja Mittal	6/11/2019	0.3	Sending MCLC supplemental retainer
274	Urja Mittal	6/11/2019	0.2	Editing and circulating supplemental retainer
275	Urja Mittal	6/11/2019	0.4	Emailing S. Lakin about supplemental retainer
276	Urja Mittal	6/11/2019	0.4	Drafting MCLC retainer
277	Urja Mittal	6/12/2019	0.6	Saving and archiving ECF emails and court entries
278	Urja Mittal	6/14/2019	0.9	Drafting MCLC allegations for amended complaint
279	Urja Mittal	6/17/2019	1.5	Editing amended complaint; emailing MCLC about amended complaint
280	Urja Mittal	6/17/2019	0.7	Call with MCLC about amended complaint
281	Urja Mittal	6/17/2019	4.0	Editing amended complaint
282	Urja Mittal	6/18/2019	5.2	Editing amended complaint
283	Urja Mittal	6/19/2019	0.2	Reviewing D. Lang edits to amended complaint
284	Urja Mittal	6/19/2019	0.3	Editing Spread the Vote termination letter and sending to Spread the Vote
285	Urja Mittal	6/19/2019	0.3	Editing Spread the Vote termination letter
286	Urja Mittal	6/19/2019	0.4	Drafting termination of representation letter for Spread the Vote
287	Urja Mittal	6/19/2019	0.3	Call with Spread the Vote
288	Urja Mittal	6/19/2019	0.3	Emails re amended complaint
289	Urja Mittal	6/20/2019	0.5	Emailing MCLC about amended complaint
290	Urja Mittal	6/20/2019	1.1	Reviewing amended complaint
291	Urja Mittal	6/20/2019	0.3	Reviewing team emails

Claimed CLC Hours

	A	B	C	D
1	Attorney	Date	Duration	Memo
292	Urja Mittal	6/20/2019	0.2	Emails re MCLC and Proud Voter
293	Urja Mittal	6/21/2019	0.5	Reading response to MTD in related case
294	Urja Mittal	6/21/2019	3.5	Editing amended complaint
295	Urja Mittal	6/24/2019	1.3	Reviewing team emails; updating case page; emailing clients with amended complaint and privilege reminder
296	Urja Mittal	7/1/2019	0.8	Call with attorney team re case schedule, PI
297	Urja Mittal	7/1/2019	0.4	Discuss case schedule with M. Danahy
298	Urja Mittal	7/10/2019	1.8	Email to D. Lang and M. Danahy re: Opp. to MTD
299	Urja Mittal	7/15/2019	4.5	Editing MTD opposition brief
300	Urja Mittal	7/16/2019	0.9	Updating case file on Sharepoint
301	Urja Mittal	7/16/2019	0.2	Discuss MTD opposition brief with M. Danahy
302	Urja Mittal	7/16/2019	1.1	Editing MTD opposition brief
303	Urja Mittal	7/17/2019	0.8	Reviewing draft of MTD opposition brief
304	Urja Mittal	7/17/2019	0.4	Emails and updating case file
305	Urja Mittal	7/17/2019	0.3	Emails with legal team
306	Urja Mittal	7/18/2019	1.4	Editing draft of MTD opposition brief
307	Urja Mittal	7/18/2019	1.0	Editing draft of MTD opposition brief
308	Urja Mittal	7/18/2019	3.1	Editing draft of MTD opposition brief
309	Urja Mittal	7/19/2019	0.1	Reviewing final opposition to MTD
310	Urja Mittal	7/19/2019	0.3	Correcting docket information and emailing Tom re: client disclosure statement
311	Urja Mittal	7/19/2019	1.3	Editing draft of MTD opposition brief
312	Urja Mittal	7/22/2019	0.7	Emails to clients and re: MTD opposition brief to review
313	Urja Mittal	7/22/2019	0.8	Email to CLC practice team re: MTD opposition brief
314	Urja Mittal	7/22/2019	0.2	Checking PACER for updated address, updating case files
315	Urja Mittal	7/29/2019	0.1	Notes from meeting with D. Lang
316	Urja Mittal	8/1/2019	1.2	Emails to clients about withdrawing from case
317	Urja Mittal	8/2/2019	0.5	Drafting notice of withdrawal and sending to Tom for filing
318	Total		252.86	